

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) Civil Action No.  
                                )  
\$521,837.00 IN U.S. CURRENCY, )  
\$188,269.34 IN FUNDS FORMERLY IN )  
ACCOUNT #6252971597 AT CITIZENS )  
BANK, and \$17,350.00 IN FUNDS )  
FORMERLY IN SAFE DEPOSIT BOX )  
A166 (D-17) AT CITIZENS BANK, )  
                                )  
Defendants.                 )

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America by and through its counsel, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Lee J. Karl, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. This is a civil action in rem for the forfeiture to the United States of \$521,837.00 in U.S. Currency, \$188,269.34 in funds formerly in account #6252971597 at Citizens Bank, and \$17,350.00 in funds formerly in safe deposit box A166 (D-17) at Citizens Bank, hereinafter, collectively, (the "Defendant Currency"), pursuant to 21 U.S.C. §881(a)(6).
2. Jurisdiction is predicated upon 28 U.S.C. § 1345 and § 1355. Venue is proper under 28 U.S.C. § 1395 and § 1355.
3. The Defendant Currency was seized as part of an investigation of Paris Wilson and others, the defendants in a related criminal case at 14-CR-132. The Defendant Currency has

remained in the Western District of Pennsylvania in the custody of the United States Marshals Service.

4. Paris Wilson and others have been the subject of a criminal investigation (the "Investigation") conducted by the Federal Bureau of Investigation (the "FBI") for violations of 21 U.S.C. §841, 21 U.S.C. §846, and 21 U.S.C. §861. The Investigation revealed that Paris Wilson and others unlawfully sold and distributed heroin and generated thousands of dollars of illegal drug proceeds.

5. On May 29, 2014, pursuant to a federal search warrant, the FBI seized \$521,837.00 of the Defendant Currency from the residence of Paris Wilson's grandmother, Barbara Stegman, at 1186 Brintell Street, Pittsburgh, Pennsylvania. The investigation revealed that the residence at 1186 Brintell Street is known to be a stash house used by Paris Wilson to store proceeds from the sale of illegal drugs.

6. Also on May 29, 2014, pursuant to a federal seizure warrant, \$188,269.00 of the Defendant Currency was seized from funds in a non-interest bearing account, #625297159, in the name of Barbara Stegman at Citizens Bank in Wilkinsburg, PA.

7. Also on May 29, 2014, pursuant to a federal seizure warrant, \$17,350.00 of the Defendant Currency was seized from safe deposit box A166 (D-17) in the name of Barbara Stegman.

8. Subsequent to the seizure, the FBI instituted administrative forfeiture proceedings against the Defendant Currency. The father of the defendant, Harris Wilson, filed claims to the Defendant Currency as part of the administrative proceedings. As a result, the United States has instituted this civil forfeiture action against the Defendant Currency.

9. On May 21, 2014, a Grand Jury in the Western District of Pennsylvania returned a seven-count Indictment against Paris Wilson and others for possession and distribution of

controlled substances containing heroin, as well as for employing minors to distribute controlled substances. The Indictment is attached as Exhibit A.

10. The Defendant Currency represents proceeds generated from the conspiracy to distribute heroin and the distribution of heroin in violation of 21 U.S.C. §§841 and 846, and, therefore, is forfeitable to the United States pursuant to 21 U.S. C. § 881(a)(6).

11. By reason of the foregoing, and under the provisions of 21 U.S. C. § 881(a)(6), the Defendant Currency is forfeitable to the United States.

WHEREFORE, the United States of America respectfully requests that process of warrant in rem issue for the arrest of the Defendant Currency; that judgment of forfeiture be entered in favor of the United States for the Defendant Currency; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this Action.

Respectfully submitted,

DAVID J. HICKTON  
United States Attorney

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VERIFICATION

I am a Special Agent of the Federal Bureau of Investigation, Department of Justice, and the case agent assigned the responsibility for this case.

I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 6<sup>th</sup> day of November, 2014.



Aaron Francis, Special Agent  
Federal Bureau of Investigation